

PROPOSAL EVALUATION

Integrated Regional Water Management Implementation Proposition 50, Chapter 8 IRWM Implementation Step 1

PIN: 4136
APPLICANT NAME: San Diego County Water Authority
PROJECT TITLE: San Diego Integrated Regional Water Management Plan
FUNDS REQUESTED: \$ 49,859,617
COST MATCH: \$175,557,944
TOTAL PROJECT COST: \$225,417,561

DESCRIPTION: SDRWMG is comprised of members representing the San Diego County Water Authority, the County of San Diego, and the City of San Diego Water Department. The proposed projects support the Regional objectives: to facilitate the integration of programs and strategies for enhancing the region's water supply, water quality, and watersheds; to improve the reliability of the region's imported and local water supplies; to reduce the region's reliance on imported water; to protect and enhance the health and viability of the region's watersheds; and to be consistent with statewide regulatory standards and priorities. The multiple benefits resulting from implementation of these projects demonstrate the SDRWMG's vision to be consistent with state water management strategies and to promote stakeholder participation and representation.

Question: Consistency with Minimum IRWM Standards - This evaluation will focus on whether the applicant has demonstrated that the IRWM Plan meets the minimum standards.

Pass or Fail

Question: Consistency with IRWM Standards - Adopted IRWM Plan and Proof of Formal Adoption. Weighting factor is 1. 2

The applicant provides a schedule (att. 4) for adoption of their Draft IRWM Plan by 1/1/07. In addition, the applicant has an MOU with the Regional Water Management Group (RWMG) consisting of the following agencies: San Diego County Water Authority, County of San Diego, and City of San Diego Water Department. Adoption of the IRWMP is expected by 1/1/07.

Question: Consistency with IRWM Standards - Description of Region. Weighting factor is 1. 3

Enough information is provided to indicate the region defined in the proposal is appropriate for implementation of the IRWMP. The graphic representation is thorough. The description of the region is focused on the environmental characteristics of the area. Social and cultural resources are not fully addressed. There is only indirect discussion of water quality issues in the region. More references should have been included given the magnitude and detail of the information provided.

Question: Consistency with IRWM Standards - Objectives. Weighting factor is 1. 4

The applicant identifies five IRWMP objectives and includes discussion that adequately addresses the criteria. The objectives are conceived through collaborative regional planning efforts between regulatory and public entities. Known water conflicts are briefly discussed and sufficient detail supporting the objectives is not provided.

Question: Consistency with IRWM Standards - Water Management Strategies and Integration. Weighting factor is 1. 3

Applicant briefly addresses all statewide water management strategies (WMS) in section 4, pages 23 to 52. On page 25, applicant explains that the completed IRWMP will contain much more extensive analysis of each WMS. The application focuses on listing the various plans and issues but provides little discussion of the integration of the plans and strategies. Good information and background on the individual issue addressed by each strategy is provided. Each of the water management strategies is mentioned. However, more information needs to be provided on how each of the various strategies will work together to achieve the stated objectives. The added benefits of the integration of multiple water management strategies are only briefly discussed. More focus on what the plan will actually do needs to be incorporated.

Question: Consistency with IRWM Standards - Priorities and Schedule. Weighting factor is 1. 2

The proposal identifies short-term and long-term priorities for implementation of the plan but the discussion is vague and generalized. The applicant indicates more detail will be provided in the proposed future IRWMP to be completed utilizing more extensive stakeholder input. The applicant mentions they will create a mechanism for modifying the adopted IRWM plan in response to regional and expanded stakeholder participation but does not provide appropriate details. The plan does not address how decision-making will be responsive to changes, responses to implementation projects will be assessed, or adjustment of project sequencing based upon changed conditions.

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Question: Consistency with IRWM Standards - Implementation. Weighting factor is 1.

2

Supporting information for these criteria depends largely on the proposed plan which is under development. The applicant only indicates that the criteria further addressed in the completed plan, therefore little detail can be provided. Although there is discussion of plan implementation the detail addresses water management strategies and not IRWM plan projects, costs, schedule, or specific actions for implementation of projects. Also, limited supporting information is provided for the feasibility of implementing the plan. There is no discussion of institutional structure to ensure project development or mechanism for monitoring the performance of individual projects. The time schedule provided covers only the time to implement an entire project and does not discuss individual tasks.

Question: Consistency with IRWM Standards - Impacts and Regional Benefits. Weighting factor is 1.

2

Applicant indicates detail for these criteria will be provided in the proposed IRWMP that is under development. The proposal does describe the basis of the future analysis to be included in the IRWMP. Discussion of impacts and benefits is limited to the implementation of the projects identified in the plan, completing CEQA, and using the public comment period as a way to evaluate impacts and benefits. There is limited to no discussion on benefits to DAC, interregional benefits & impacts, or advantages of the regional plan as opposed to individual local efforts.

Question: Consistency with IRWM Standards - Technical Analysis and Plan Performance. Weighting factor is 1.

1

The proposal does not include much relevant discussion pertaining to this criterion and relies on completion of the proposed IRWMP to provide the necessary information at a future date. Applicant does provide a brief discussion of the technical analysis and plan performance but there is no rationale on documentation on which it can be based until the IRWMP has been completed.

Question: Consistency with IRWM Standards - Data Management. Weighting factor is 1.

3

The proposal lays out the goals for a system that will be designed to handle the data generated from grant funds. However, the description is general and contains only a few specifics. The inclusion of language such as "scope and content will be determined" demonstrates that the plan is only a very early draft and that this section still needs development. The proposal mentions SWAMP, GAMA, and GEIMS and only briefly discusses how the data collected under the grant will support statewide data needs. Applicant does not address the state of existing monitoring efforts in the region for water supply and water quality and how such data is disseminated to public. With these limitations in mind, the general approach described does have merit if eventually realized in the final IRWM plan and implementation.

Question: Consistency with IRWM Standards - Financing. Weighting factor is 1.

3

The Applicant indicates once the IRWMP has been adopted the scope of financing options and project costs can be better defined. The program presented for implementation of the projects seems feasible, but is so general that it is difficult to perform an effective evaluation. Beneficiaries are not discussed and other potential funding sources are only briefly discussed. An important strength of this proposal is that each of the member agencies has already committed up to \$100,000 to develop the IRWMP.

Question: Consistency with IRWM Standards - Relation to Local Planning & Sustainability. Weighting factor is 1.

2

The applicant briefly addresses this criterion and depends again on the IRWMP under development to better address these criteria once completed. The applicant does not discuss in detail or demonstrate coordination with local land-use planning decision makers nor does the proposal relate IRWMP projects to local planning agencies. The proposal does include a useful table that shows examples of the relationships between the San Diego IRWMP documents to the state's water management strategies.

Question: Consistency with IRWM Standards - Stakeholder Involvement & Coordination. Weighting factor is 1.

2

The applicant indicates they will expand on detail addressing this criterion in the IRWMP still under development. The RWMG did not demonstrate stakeholder involvement through a collaborative regional process in the development of the draft IRWM plan. The plan relies heavily on Project Clean Water and the associated Watershed Protection Technical Advisory Committee as the vehicle for involving stakeholders. While this group may well represent all necessary interested parties, the proposal and IRWMP would be strengthened if the process by which the group was formed and even the members themselves were more thoroughly described. In addition, there was no EJ or DAC concerns raised or illustration of their involvement in the planning process.

Question: Funding Match. This evaluation will focus on whether the applicant has demonstrated the ability to meet the minimum funding match or has requested a waiver or reduction in the funding match.

Pass

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Question: Description of Proposal. Weighting factor is 3.

9

The 23 projects identified are consistent with and address the objectives of the IRWMP. Detailed descriptions of each project are provided, but could be improved by the inclusion of major milestones and subtasks. Most of the water management elements of section III.C of the Guidelines are covered. The role of each project in achieving the objectives of the plan could be made more project-specific. A discussion of how compliance with applicable environmental laws is needed. Many of the projects are in the planning stages. Therefore, they do not have associated Pilot Projects or Feasibility Reports. While the projects appear reasonable and appropriate, further details would enhance the reviewer's ability to adequately evaluate the projects and their relationship to the overall plan.

Question: Project Prioritization. Weighting factor is 2.

8

The applicant's prioritized projects are based on regional objectives, regional need and relation to individual projects. The highest priority projects are grouped into six categories. In addition to the "fact sheet" for these projects, a summary paragraph attempts to directly address the elements outlined in the guidelines. More detail is needed to fully understand the relationship between the priority projects and the IRWM Plan particularly since the IRWM Plan is not yet adopted and many sections are still being developed. The applicant does not provide a prioritization of the projects within the region.

Question: Cost Estimate. Weighting factor is 1.

3

The cost estimates for projects and associated tasks appear reasonable. Estimates are provided for each of the elements listed in the guidelines and match amounts meet or exceed the ten percent requirement. The estimates are not adequately supported. They are simply presented as lump sums in tabular format. It is difficult to evaluate lump sum estimates without some supporting documentation. Information provided for some project budgets is incomplete.

Question: Schedule. Weighting factor is 1.

2

The schedule lacks important detail and does not suggest an integrated approach to implementation is planned. It simply shows all projects starting in the spring of 2006 and continuing until completion. Subtasks for individual projects are not presented. In addition, related projects or elements that won't be funded under Prop 50 IRWM program are not shown on the schedule. The schedule is also lacking important milestones which may vary among projects such as environmental review and permitting requirements.

Question: Need. Weighting factor is 2.

6

Applicant describes the need for the proposal in attachment 9. The proposal describes the need for each project and how the projects will meet that need. Potential economic, environmental and fiscal impacts are not adequately discussed relative to the need for the project. The discussion of potential negative impacts that could result from not completing the projects also needs further development.

Question: Disadvantaged Communities. Weighting factor is 2.

8

The applicant has adequately addressed all DAC criteria. The proposal thoroughly describes DAC in the region. The specific DAC benefiting from the project is not consistently identified, however, and the applicant could make it easier to associate particular projects with those areas. The direct advantage of each project that benefits a DAC is only sometimes described on the "fact sheet" associated with each project. For example, the Chollas Creek Re-vegetation Project "fact sheet" does not discuss the benefits in relationship to a DAC, but the Tijuana River Watershed Invasive Plant Control Program does. A table associating the listed projects with benefits to a DAC would have made this discussion more clear.

Question: Program Preferences. Weighting factor is 1.

3

The proposal addresses 4 of 5 program preferences as identified in Section 2e of the guidelines. Of those mentioned not all are supported with thorough documentation. Specific sections of the plan or project descriptions are referenced. The proposal does provide examples of the preferences that are served by the various projects but there is no detail on how it will be accomplished. The applicant does not address the safe drinking water and water quality projects that serve DAC in there discussion of this criteria, however, this issue is briefly discussed in the DAC attachment.

TOTAL SCORE: 68